

# EXHIBIT L

Excerpts from Deposition of Helen Lovelace

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE WESTERN DISTRICT OF TENNESSEE

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3 DANIEL LOVELACE and  
4 HELEN LOVELACE, Individually,  
5 and as Parents of BRETT LOVELACE,  
6 deceased,

7 Plaintiff,

8 Vs.

NO.2:13-cv-02289-JPM-dkv

9 PEDIATRIC ANESTHESIOLOGISTS, P.A.;  
10 BABU RAO PAIDIPALLI; and MARK P.  
11 CLEMONS, MD.

12 Defendants.

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13 THE DEPOSITION OF HELEN LOVELACE  
14 January 15, 2014

15 VIDEO DEPOSITION

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20  
21  
22  
23 Madelyn E. Gray  
24 Court Reporter  
Suite 303, 22 N. Second Street  
Memphis, Tennessee 38103  
(901) 527-1100



COPY

1 walked into PACU with Dr. Clemons.

2 Q. Okay.

3 A. That's the first time I had saw her.

4 Q. All right. But did she say, when you  
5 were in PACU, that he had rolled over on his  
6 stomach on the way from the OR to PACU?

7 A. Yes. When Dr. Clemons asked me about  
8 Brett being, if he slept on his stomach.

9 Q. Okay.

10 A. That's when Nurse Kish told Dr. Clemons  
11 and I that that's when he had rolled over.

12 Q. Okay. Was there anymore discussion among  
13 the three or four of you about sleeping on his  
14 stomach?

15 A. No.

16 Q. What was Brett's -- I mean, was he awake  
17 at all, partially awake, groggy, out of it?

18 A. He was not awake at all.

19 Q. Okay. And was he ever awake at all  
20 during --

21 A. No.

22 Q. Let me finish.

23 A. He was never awake from the time I walked  
24 into PACU until I left on Thursday without my